

# Exhibit H

**Blume, Michael (USANYE)**

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**From:** Caleb Kruckenberg <CKruckenberg@pacificlegal.org>  
**Sent:** Tuesday, April 11, 2023 1:53 PM  
**To:** Stamatelos, Pauline (USANYE); Steve Simpson; Jonathan Houghton  
**Cc:** Marutollo, Joseph (USANYE); Blume, Michael (USANYE); Merenda, Jill (USANYE)  
**Subject:** [EXTERNAL] RE: US v. Rare Breed Triggers, No. 23-369 Discovery, Service

Pauline:

To follow up on our conversation yesterday.

1. We wouldn't object to your subpoenas to the extent that they would reveal only anonymous customer information. As we discussed, we also don't object to targeted requests for *non-anonymous* information related to chargebacks, returns or customer complaints. I'll look for your redlines soon. In the interest of timing, if we can't reach an agreement by COB tomorrow, I'll need to file a motion to quash.
2. With respect to scheduling, I'd propose that Defendants' response to the PI motion be due May 5th, and your reply (if any) due by the 19th. That would make the issue fully briefed at least a few days in advance of the hearing.

**Caleb Kruckenberg** | Attorney\*

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\*Admitted to practice in DC, NY, PA and VA



**PACIFIC LEGAL FOUNDATION**

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**From:** Stamatelos, Pauline (USANYE) <Pauline.Stamatelos@usdoj.gov>

**Sent:** Friday, April 7, 2023 3:23 PM

**To:** Steve Simpson <SSimpson@pacificlegal.org>; Caleb Kruckenberg <CKruckenberg@pacificlegal.org>; Jonathan Houghton <JHoughton@pacificlegal.org>

**Cc:** Marutollo, Joseph (USANYE) <Joseph.Marutollo@usdoj.gov>; Blume, Michael (USANYE) <Michael.Blume@usdoj.gov>; Merenda, Jill (USANYE) <Jill.Merenda@usdoj.gov>

**Subject:** RE: US v. Rare Breed Triggers, No. 23-369 Discovery, Service

Hi Steve, what time after 2:30 pm on Monday works for you? thanks, Paulina

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**From:** Steve Simpson <[SSimpson@pacificlegal.org](mailto:SSimpson@pacificlegal.org)>

**Sent:** Friday, April 7, 2023 2:56 PM

**To:** Stamatelos, Pauline (USANYE) <[PStamatelos@usa.doj.gov](mailto:PStamatelos@usa.doj.gov)>; Caleb Kruckenberg <[CKruckenberg@pacificlegal.org](mailto:CKruckenberg@pacificlegal.org)>; Jonathan Houghton <[JHoughton@pacificlegal.org](mailto:JHoughton@pacificlegal.org)>

**Cc:** Marutollo, Joseph (USANYE) <[JMarutollo@usa.doj.gov](mailto:JMarutollo@usa.doj.gov)>; Blume, Michael (USANYE) <[MBlume@usa.doj.gov](mailto:MBlume@usa.doj.gov)>; Merenda, Jill (USANYE) <[JMerenda@usa.doj.gov](mailto:JMerenda@usa.doj.gov)>

**Subject:** [EXTERNAL] RE: US v. Rare Breed Triggers, No. 23-369 Discovery, Service

Counsel, please be advised that Defendants intend to move to quash the subpoenas to the extent they seek our clients' customer lists. Based on Judge Morrison's statements in the recent status conference, we don't believe that the Government is entitled to customer lists. We are happy to discuss the issue further if you have any questions or if there is some chance the Government would narrow its subpoenas. Caleb is traveling today and I'm on the west coast, so Monday would work best for us. Thanks.

Steve

**Steve Simpson | Senior Attorney\***

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Defending Liberty and Justice for All.

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**From:** Stamatelos, Pauline (USANYE) <[Pauline.Stamatelos@usdoj.gov](mailto:Pauline.Stamatelos@usdoj.gov)>

**Sent:** Wednesday, April 5, 2023 11:55 AM

**To:** Caleb Kruckenberg <[CKruckenberg@pacificlegal.org](mailto:CKruckenberg@pacificlegal.org)>; Steve Simpson <[SSimpson@pacificlegal.org](mailto:SSimpson@pacificlegal.org)>; Jonathan Houghton <[JHoughton@pacificlegal.org](mailto:JHoughton@pacificlegal.org)>

**Cc:** Marutollo, Joseph (USANYE) <[Joseph.Marutollo@usdoj.gov](mailto:Joseph.Marutollo@usdoj.gov)>; Blume, Michael (USANYE) <[Michael.Blume@usdoj.gov](mailto:Michael.Blume@usdoj.gov)>; Merenda, Jill (USANYE) <[Jill.Merenda@usdoj.gov](mailto:Jill.Merenda@usdoj.gov)>

**Subject:** US v. Rare Breed Triggers, No. 23-369 Discovery, Service

Counsel,

Consistent with the Court's order, please see attached.

Thank you,

Paulina Stamatelos